



December 2, 2010

Federal Communications Commission
Wireless Telecommunications Bureau
445 12th Street, SW
Washington DC, 20554

RE: DA-10-1877A, PS Docket No. 06-229

Dear Ms. Dortch,

Miami-Dade County opposes the flexible use of 700 MHz public safety narrowband spectrum and the adjacent guard band spectrum for the use of broadband. Miami-Dade County feels that flexible use for broadband of the 700 MHz narrowband voice spectrum would be detrimental to the existing usage of this spectrum and the future plans for both narrowband and broadband spectrum in the area.

Miami-Dade County has deployed narrowband 700 MHz voice systems funded by PSIC grants and local funding to enhance system capability and interoperability among State, Federal, Tribal, City and County Agencies. Miami-Dade County feels that allowing broadband use of narrowband 700 MHz voice channels would compromise the integrity of our existing systems and the interoperability plans for the future.

Miami-Dade County feels that by allowing broadband to operate among narrowband voice users it will not prevent harmful interference but will increase interference and will decrease spectrum efficiency by having to add guard bands. Miami-Dade County opposes the introduction of flexibility into the narrowband 700 MHz spectrum. It should and must be retained for mission-critical voice communications.

Hopefully these comments provide the information necessary so that the existing rules governing the 700 MHz narrowband spectrum will not be changed. Our usage of this spectrum permits us to provide safe and secure communications. This enables communication requiring the coordination of multiple public safety agencies during emergencies and/or disaster situations. Overall interoperability between multiple public safety entities has benefited by the enhancement developed when the 700 MHz systems were deployed. If the rules changed it would have a serious adverse effect on the health, welfare, and safety of both the public safety personnel and the citizens they serve. Ultimately it would require transmitters that are currently functioning to be turned off and reduce the existing radio coverage required to support the area.

Please contact my office if you should have any questions concerning these comments at (305) 596-8607 or Sheryl Vanegas at (305) 596-8909.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cindy M. Cast".

Cindy M. Cast
Radio Systems Manager